

March 15, 2017

VIA ECF

The Honorable Richard J. Sullivan
United States District Judge
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *In re Welspun Litigation*, Case No. 1:16-cv-06792-RJS

Dear Judge Sullivan:

The undersigned counsel for Plaintiffs Harold Brower, Judi Talili, Samuel Jividen, and Ashley Mistler (“Plaintiffs”) and Defendant Welspun USA, Inc. (“WUSA”) submit this Letter Motion to request an extension of the time to answer or otherwise respond to Plaintiffs’ Consolidated Amended Class Action Complaint.

As Plaintiffs and WUSA informed Judge Freeman, we have elected to proceed with private mediation in the hopes of promptly resolving this matter. Pursuant to D.I. 30, we are also drafting a Proposed Case Management and Scheduling Order for submission to the Court by March 29, 2017, and anticipate that the report will propose an initial period of discovery relating to mediation during which all other deadlines will be stayed.

In light of the contemplated discovery and mediation schedule, the undersigned counsel request an additional 30 days for all served defendants to respond to the Consolidated Amended Class Action Complaint. All defendants in this matter other than Welspun India Ltd. have now been served, and their current deadline to answer or otherwise respond to the complaint is March 29, 2017—the same day that the parties intend to submit the jointly Proposed Case Management and Scheduling Order. This extension prejudices no one and avoids the considerable expense and time associated with prematurely and perhaps needlessly responding to the pending complaint.

Thank you for Your Honor’s consideration of this matter.

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Respectfully submitted,

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